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# NASA Procedural Requirements

**COMPLIANCE IS MANDATORY**

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## **Subject: NASA Logistics Management Operations Compensating Controls Reviews**

**Responsible Office: Logistics Management Division**

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## **Chapter 2. Procedures**

### **2.1 Introduction**

2.1.1 CCRs shall be conducted at NASA Centers and performed on a rotational basis as determined by events and priorities. HQ LMD will develop a tentative schedule of reviews to be performed annually.

2.1.2 Prior to the review, the Office of Strategic Infrastructure (OSI) shall send a letter to the Center Director, with a copy to the Center Logistics Manager, coordinating the scope and time of the review.

2.1.2.1 Upon notification by HQ LMD of a scheduled review, Centers shall send their information, procedures, guidelines, logistics contractor statements of work, and personnel information to the CCR Team Lead.

2.1.2.2 The information and specified documents and policies relating to supply and equipment management shall be reviewed by the CCR Team prior to the actual site visit.

### **2.2 Review Process**

2.2.1 The CCR Team shall review and evaluate the processes and procedures of the Center's LMO, including supply, disposition, storage/warehousing, equipment management, contract property management, mail management, and transportation/fleet management programs to ensure compliance with policies, requirements, and guidance in NPDs, NPRs, and other applicable documents.

2.2.2 An entrance briefing shall be held with Center officials, including the Supply and Equipment Management Officer (SEMO), the Industrial Property Officer (IPO), the Property Disposal Officer (PDO), and the Transportation Officer. The entrance briefing shall include the following:

- a. Purpose and objectives of the CCR.
- b. Overview of logistics management operations.
- c. Identification of key personnel.
- d. Arrangements for meetings and interviews.
- e. Provisions for the completion of the review.

2.2.3 CCRs are conducted in accordance with written criteria, checklists, and/or protocols based on applicable requirements (e.g., NPDs, NPRs, Federal regulations). The criteria includes a review of previous findings, if applicable, corrective actions, and an evaluation of the continued effectiveness of those corrective actions.

2.2.4 To maximize the value of each CCR, continual communication between the CCR Team and the Center LMO staff will occur throughout the review schedule.

2.2.5 Each CCR Team member will be assigned (by the CCR Team Lead) one or more functional areas to evaluate.

2.2.5.1 Best business practices and review methods shall be used to ensure that the processes and procedures of the Center are in compliance with current property management requirements.

2.2.5.2 All records/documentation pertaining to responsibilities, deviations, delegations, staffing, and training within each of the Center's functional areas shall be reviewed, including the following:

- a. Supply/Material Management: Requisitioning; purchase card transactions; desktop/Just-In Time deliveries; store, standby, and program stocks; warehousing; supply management system; Federal Catalog System, Activity Address Codes; inventory control/transactions; and turnover ratios.
- b. Equipment: Acquisition; receiving, identification; equipment controls; financial accountability; property accountability; controlled property; noncontrolled property; sensitive property; historical assets; loans/leases, both domestic and foreign; movement and storage, utilization and maintenance; reports of survey; physical inventories; and support for special programs.
- c. Disposal: Acquiring/reporting NASA idle or excess personal property; screening timeframes; utilization/donation/sales of personal property; Stevenson-Wydler Technology Innovation Act transfer documentation; disposal of foreign property; exchange/sale of property; recovery of precious metals; excess warehouse; short/long-term storage.
- d. Transportation/Fleet Management: Packaging, handling, and transportation of equipment; acquisitions; utilization; fuel consumption; alternative fuels; maintenance; safety; motor vehicle database; fleet card; license tags; excess vehicles; specialized motor equipment; watercraft; trains; passports/visas; household goods/shipments;

transit subsidy program; carpools/vanpools; and local travel.

e. Mail Management: Management of internal, incoming, and outgoing mail; postal accountability of costs for commercial meter mail processing; compliance with Agency, U.S. Postal Service, and General Services Administration domestic and international mail management standards and guidelines; security training of mail center employees and handling of suspicious mail.

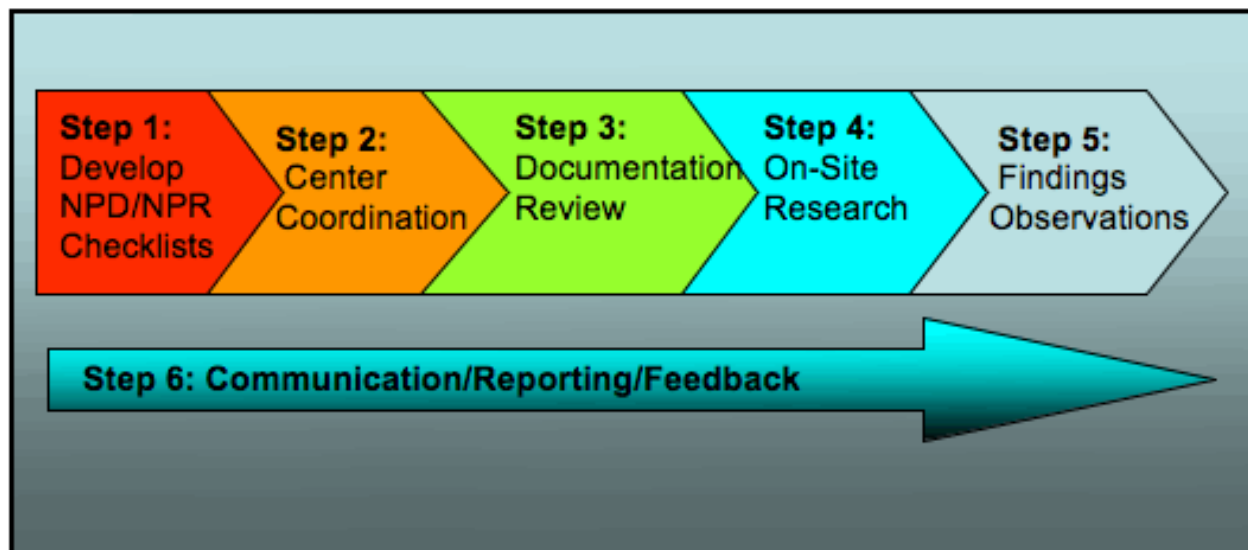
f. Contract Property Management: Procurement documentation; grants and cooperative agreements; reviews of contractor property management systems, standards, and practices; property accountability controls; delegations; plant clearance; and disposition.

2.2.5.3 Each Team member will also interview key logistics management personnel.

2.2.5.4 Interview notes shall be taken as accurately as possible, documented, and retained to reflect key questions and will be retained as a backup.

2.2.5.5 Team members also shall summarize their observations and recommendations for incorporation into the final summary report.

2.2.6 The CCR methodology is divided into six general steps as identified in Figure 2-1.



**Figure 2-1: Compensating Controls Review Methodology**

2.2.7 The Review Team shall meet daily to provide progress updates and discuss preliminary observations and recommendations.

2.2.7.1 Any significant findings identified during the Review Team meetings shall be discussed with the Center Logistics Operations Director and the Director of LMD.

2.2.8 Upon the conclusion of the review, the CCR Team shall conduct an exit briefing with Center personnel, including the Center Director or designee.

2.2.8.1 The Team shall present observations and recommendations at the exit conference. During the meeting, the Team provides the Center representatives with an opportunity to comment or voice dissenting opinions.

2.2.9 At the conclusion of the CCR and upon return to HQ, the Team shall draft a report of the observations and recommendations as specified in Chapter 3.

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